UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

STUDENTS AGAINST ANTISEMITISM, INC., STANDWITHUS CENTER FOR LEGAL JUSTICE, MILES RUBIN, DANIELLA SYMONDS, ERIN MCNULTY, NOAH MILLER, VALERIE GERSTEIN, KATIANA ARYEH, LAURA BELLOWS, LEMONY DAVID, JOHN DOE, CHAYA DROZNIK, LEO ELKINS, SAMUEL FRIEDMAN, MAYA GAL, AYELET GLASER, MICHAEL GROSS, JARED HARNICK, GABRIEL KAHANE, TALIA KESSELMAN, ELI MIZRAHI-AKS, OMER NAUER, AMIEL NELSON, GABRIEL NELSON, MOLLY NELSON, MARC NOCK, AVA QUINN, TALIA RABBAN, JANE ROE, SOPHIE RUKEYSER, ALIZA RUTTENBERG, EMILY SANDLER, ANDREW STEIN, JONATHAN SWILL, RAFAEL VANUNO, XAVIER WESTERGAARD, EDEN YADEGAR, and LILY ZUCKERMAN,

Plaintiffs,

v.

THE TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK, and TRUSTEES OF BARNARD COLLEGE,

Defendants.

No. 1:24-cv-01306

RESPONSE OF DEFENDANT TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK TO PLAINTIFFS JOHN DOE AND JANE ROE'S MOTION FOR LEAVE TO PROCEED UNDER PSEUDONYMS

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July 2, 2024

On February 21, 2024, Plaintiffs Students Against Antisemitism, Inc., StandWithUs Center for Legal Justice, Miles Rubin, Daniella Symonds, Erin McNulty, Noah Miller, and Valerie Gerstein commenced this action. ECF 1. On June 17, 2024, Plaintiffs filed a First Amended Complaint on behalf of thirty-one additional plaintiffs, including John Doe and Jane Roe. ECF 39 ("FAC"). That same day, Plaintiffs Doe and Roe moved for leave to proceed under pseudonym (the "Motion"). ECF 41 ("Mot."). Defendant The Trustees of Columbia University in the City of New York ("Columbia" or "the University") now respectfully submits this response to the Motion.

Columbia takes no position—at this preliminary stage of the case—regarding Doe and Roe's request to proceed under pseudonym.¹ If the Court decides that Doe and Roe may proceed under pseudonym for the time being, Columbia would eventually need to learn Doe's, and perhaps Roe's, identity in the discovery process to properly defend the case. Indeed, Plaintiffs' counsel appears to have acknowledged as much by expressing the intent, if the Motion is granted, to meet and confer with Columbia (and Barnard College) concerning who will be allowed to know Doe and Roe's identities during various stages of the litigation. Mot. at 7 n.3.

Dated: July 2, 2024

New York, New York

Respectfully submitted,

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¹ Roe is alleged to be a graduate of Barnard College. FAC ¶ 41. As such, Roe's claims, if any, would presumably lie against Barnard College. Nevertheless, Columbia addresses Roe's motion to the extent she purports to bring any claims against the University.